

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE Valsartan N-Nitrosodimethylamine Products Liability Litigation	: : : : : :	Civil Action No. 1:19-MD-02875-RBK-JS
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**MOTION FOR REASSIGNMENT OF RELATED ACTIONS PENDING IN THE
DISTRICT OF NEW JERSEY**

Defendants Zhejiang Huahai Pharmaceutical Co., Ltd., Princeton Pharmaceutical Inc., Solco Healthcare U.S., LLC, and Huahai U.S., Inc. (together, the “ZHP Defendants”) respectfully request that this Court reassign the cases identified in the attached Schedule of Actions to Judge Robert B. Kugler, to whom the Judicial Panel of Multidistrict Litigation has assigned the above-captioned MDL. *See* Dkt. 1. On February 14, 2019, the JPML issued a Transfer Order transferring Valsartan-related actions to the District of New Jersey and assigning them, with the District’s consent, to Judge Kugler. The Transfer Order concluded that all “putative consumer class actions seeking economic damages” and “related personal injury actions alleging that plaintiffs developed cancer as a result of using valsartan containing NDMA or NDEA impurities” should be centralized in the above-captioned MDL. Dkt. 1 at 3.

The attached Schedule of Actions identifies six additional Valsartan actions that were identified to the JPML as potential tag-alongs and that are currently pending before other judges in this District. These six actions fall within the scope of the JPML’s Transfer Order. Under Rule 7.2(a) of the Rules of the JPML, the ZHP Defendants request reassignment of these actions to Judge Kugler as the § 1407 transferee judge.

WHEREFORE, the ZHP Defendants respectfully request that this Court reassign the cases in the attached Schedule of Actions to Judge Robert B. Kugler for coordination under 28 U.S.C. § 1407.

Dated: February 20, 2019

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on February 20, 2019, I served the foregoing Motion for Reassignment of Related Actions Pending in the District of New Jersey on all counsel of record via the CM/ECF system.

/s/ Seth A. Goldberg